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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, et al., individually and  
on behalf of others similarly situated,

Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,  
Defendant.

Case No. 3:18-cv-01477-JR

**PLAINTIFFS' UNOPPOSED MOTION  
TO UNSEAL ECF NO. 269 AND FILE  
REDACTED COPY OF ECF NO. 268**

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**L.R. 7-1(a) Certification**

In compliance with Local Rule 7-1(a), Plaintiffs certify that they have conferred on this Motion with Defendant Nike, Inc.’s counsel regarding the substance of this Motion. Nike does not oppose this Motion.

**MOTION TO UNSEAL**

Plaintiffs hereby submit this Motion to Unseal. On July 8, 2022, Plaintiffs filed their Sur-Sur Reply in support of Plaintiffs’ Motion for Class Certification (“Sur-Sur Reply”), ECF No. 268; and supporting Supplemental Kan declaration (“Supp. Kan Decl.”), ECF No. 269, under seal pursuant to the Parties’ Protective Order because documents and information included in these documents were stamped Confidential by Nike under the Protective Order.

Plaintiffs met and conferred with Nike on unsealing these documents and Nike stated it has no objection to unsealing the Supp. Kan Decl. Sun Decl. ¶ 2, filed herewith. As such, Plaintiffs respectfully request that the Court unseal the Supp. Kan Decl., ECF No. 269.

Nike opposes unsealing the Sur-Sur Reply, ECF No. 268, with respect to one proposed redaction. Sun Decl. ¶ 3. Plaintiffs disagree with Nike’s proposed redactions, which involve aggregated statistical analysis results. The issue regarding aggregated statistical analysis results is already before the Court in Nike’s Motion to Seal, ECF No. 171, and Plaintiffs’ Opposition to Nike’s Motion to Seal, ECF No. 175.

In the interest of judicial efficiency and economy, Plaintiffs have agreed that the Sur-Sur-Reply may remain sealed as to Nike’s proposed redaction and that Nike can have until 7 days after the Court rules on its Motion to Seal before submitting a motion to seal for its proposed redaction to the Sur-Sur-Reply. Sun Decl. ¶ 3. In the interim, to allow the public to have access to the parts of the Sur-Sur-Reply that Nike does not seek to seal, Plaintiffs file a redacted copy of

the Sur-Sur-Reply with Nike's proposed redaction (contested by Plaintiffs), attached as Exhibit 1 to the Sun Decl.

Dated: July 27, 2022

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ Mengfei Sun

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